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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:) Date: June 7, 2005
Frederick W. Ryan, Jr.) Attorney Docket No.: F-173
Serial No.: 09/626,954) Customer No.: 00919
Filed: July 27, 2000) Group Art Unit: 3629
Confirmation No.: 9430) Examiner: Jon M. Bass
Title: **POSTAGE METERING SYSTEM FOR USE WITH BUSINESS REPLY
MAIL**

APPEAL BRIEF

Mail Stop Appeal Briefs - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

The Appellant respectfully submits the following Brief in the appeal of the subject application. The Notice of Appeal was filed on April 7, 2006, following a final Office Action dated January 17, 2006.

This Appeal Brief is submitted in triplicate.

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I. REAL PARTY IN INTEREST

Pitney Bowes Inc., a Delaware corporation, having its principal place of business in Stamford, Connecticut, is the real party in interest by way of assignment from the Appellant.

II. RELATED APPEALS AND INTERFERENCES

There are no appeals or interferences known to Appellant, his legal representatives, or the assignee that will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

III. STATUS OF CLAIMS

- (1) Claims 1-18, 21-26 and 28-44 are the subject of this Appeal and stand rejected.
- (2) Appellant hereby appeals the rejection of claims 1-18, 21-26 and 28-44.

IV. STATUS OF THE AMENDMENTS

- (1) Claims 1-19 were filed with the application on July 27, 2000. In an Amendment dated October 25, 2002, claims 1-4, 6-10, and 12-19 were amended, and claims 20-44 were added. In an Amendment dated March 6, 2003, claim 27 was cancelled. In an Amendment dated August 26, 2003, claims 4 and 15 were amended. In an Amendment dated January 29, 2004, claims 15 and 19 were amended. Finally, in an Amendment dated September 29, 2005, claims 1, 4, 9, and 15 were amended.
- (2) Appendix A attached hereto contains current claims 1-18, 21-26 and 28-44 on appeal.

V. SUMMARY OF CLAIMED SUBJECT MATTER

The present invention comprises a system of operating a postage meter for printing postage indicia information on a business reply mail piece. Business reply mail is a type of mail piece on which the delivery address has already been pre-printed by the sender. Thus, the recipient can return the mail piece to the

sender without needing to print an address on the mail piece. However, having such a pre-printed address on the mailpiece makes it difficult for computer-based postage metering systems to comply with current United States Postal regulations. Under those regulations, known as the Information-Based Indicia Program (IBIP), the United States Postal Service (USPS) allows customers to replace traditional stamps with a new “information based” postage indicium that can be generated from a user’s computer. (Page 1, line 25 to page 2, line 13). This information-based postage indicium consists of a human-readable portion and a two-dimensional bar code, both of which are printed directly on the mail piece. (Page 2, lines 22-29). The human-readable portion includes an originating address, an identification of the accounting device, the date of mailing, and postage amount. Id. The two-dimensional bar code encodes various information specifically associated with the mail piece, such as the postage amount, originating address, destination delivery point, date of mailing and a digital signature. Id. The IBIP requires that for each mail piece, the delivery address and the corresponding postage indicium be generated and printed together as an integral unit, thus to ensure address cleansing and a one-to-one correspondence between the delivery address and the associated postage indicium. (Page 2, line 30 to page 3, line 1). Because of this IBIP requirement, problems exist when a computer-based postage metering system user desires to send a business reply mail piece back to its sender. To comply with the IBIP requirement, a computer-based user would have to print an address over the top of the delivery address pre-printed by the mail sender. Clearly, this is not an acceptable way to solve the problem of complying with the IBIP requirements. To overcome these deficiencies in an acceptable manner, the present invention provides for a system that includes the steps of:

- a) having a mail campaign sender send a delivery address corresponding to a mail campaign to a data center (Fig. 4 and Fig. 5, step 502; page 8, lines 16-31)
- b) generating a registration ID corresponding to the delivery address at the data center (Fig. 4 and Fig. 5, step 506; page 9, lines 7-17)

- c) the data center providing the registration ID to the mail campaign sender (Id.);
- d) sending a business reply mail piece with a registration ID from the mail campaign sender to the postage metering system user (Fig. 4 and Fig. 5, step 508; page 9, lines 17-26);
- e) the postage metering system user sending the registration ID to the data center (Fig. 4 and Fig. 5, step 510; page 9, line 27 – page 10, line 1);
- f) generating postage indicium information using the registration ID at the data center (Fig. 4 and Fig. 5, step 512; page 10, lines 1-8);
- g) transmitting the postage indicium information to the postage metering system (Id.); and
- h) printing the postage indicium on the business reply mail piece (Fig. 4, page 10, lines 1-10; and Fig. 1, page 6, lines 9-11).

Fig. 4 of the Specification, which illustrates a schematic diagram of the information flow for a life cycle of a business reply mail piece according to the Appellant's invention, is reproduced below:

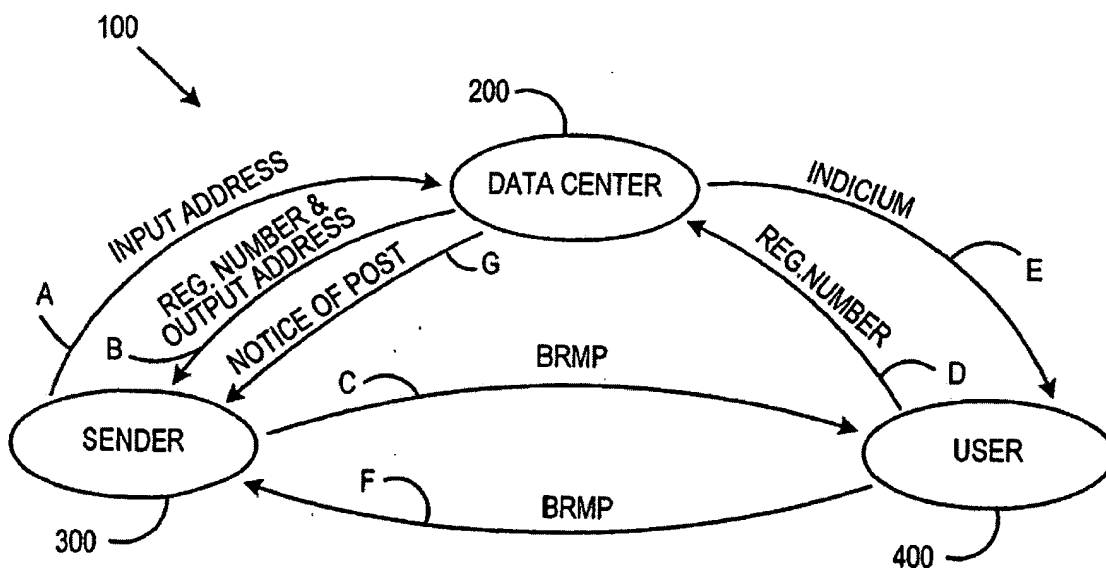


FIG. 4

Fig. 5 of the Specification, which illustrates a schematic diagram of a flow chart describing the operational characteristics of a business reply mail piece according to Appellant's invention, is reproduced below:

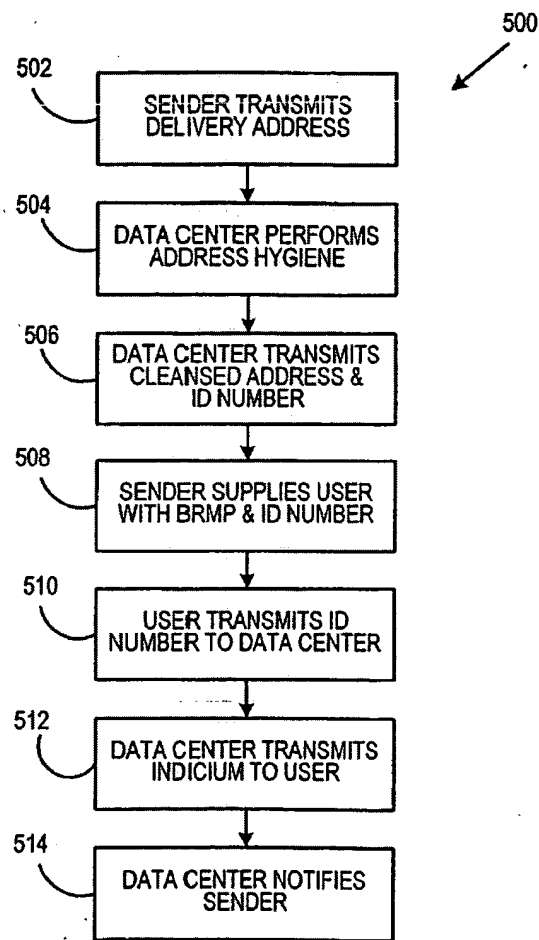


FIG. 5

Independent claim 1 is directed to a method of operating a postage metering system for printing a postage indicium subsidized by a mail campaign sender for use with a business reply mail piece, the method comprising the step(s) of: "transmitting a registration ID number, provided by the mail campaign sender to a user, from the postage metering system to a data center, the registration ID number being associated with a delivery address previously

defined by the mail campaign sender, and disclosed in human readable form to the user of the postage metering system (Fig. 4; Fig. 5, step 500, page 9, lines 17-26); receiving postage indicium information at the postage metering system from the data center, the postage indicium information generated using the registration ID number and including data relating to the delivery address (Fig. 4; Fig. 5, steps 510-512; page 9, line 27 – page 10, line 8); and printing the postage indicium on the business reply mail piece at the postage metering system using the postage indicium information (Fig. 1, page 6, lines 9-11).

Independent claim 4 is directed to a method of operating a data center for generating postage indicium information for use with printing a postage indicium on a business reply mail piece, the method comprising the step(s) of: “receiving a delivery address from a mail campaign sender corresponding to a mail campaign of which the business reply mail piece is a part (Fig. 4; Fig 5, step 502; page 8, lines 16-31); generating a registration ID number corresponding to the delivery address (Fig. 4; Fig. 5, step 506; page 9, lines 7-17); providing the registration ID number to the mail campaign sender (Id.); establishing a transaction session with a postage metering system (Fig 4; Fig 5, step 508; page 9, lines 17-26); receiving the registration ID number from the postage metering system, where the registration ID number and delivery address in human readable form were previously provided by the mail campaign sender to a user of the postage metering system (Fig. 4; Fig. 5, step 510; pages 9, line 27 – page 10, line 1); generating the postage indicium information using the registration ID number and data relating to the delivery address; and transmitting the postage indicium information to the postage metering system for use in printing the postage indicium on the business reply mail piece (Fig. 4; Fig. 5, step 512; page 10, lines 1-10).”

Independent claim 9 is directed to a method of operating a business reply mail processing system by a mail campaign sender, the method comprising the step(s) of “providing a delivery address, associated with a particular mail

campaign which includes a business reply mail piece, to a data center (Fig. 4; Fig. 5, step 502; page 8, lines 16-31); receiving from the data center a registration ID number associated with the delivery address (Fig. 4; Fig. 5, steps 506; page 9, lines 7-17); and supplying the registration ID number, the business reply mail piece and delivery address in human readable form to a user of a postage metering system, where the registration ID number is used by the user to print a postal indicium on the business reply mail piece including data relating to the delivery address (Fig. 4; Fig. 5, step 508; page 9, lines 17-28)."

Independent claim 15 is directed to a memory device in operative communication with a computing system, the memory device comprising: "a plurality of mail campaign sender accounts associated with respective mail campaign senders, where each of the plurality of mail campaign sender accounts includes a registration ID number associated with a delivery address and a particular mail campaign of which a business reply mail piece is a part, respectively, where said registration ID number is used to generate a postage indicium, and where said postage indicium and delivery address are provided in human readable form to a user of a postage metering system (Fig. 1; page 6, line 4 – page 7, line 28; Fig. 5; steps 506-512; page 9, line 7 – page 10, line 10)."

Thus, the present invention overcomes the disadvantages discussed above, whereby a computer-based postage metering user is not able to use pre-printed business reply mail in compliance with the United States Postal Service's IBIP regulations, because processing business reply mail in conventional fashion would result in one address (generated by the postage metering system) being printed over the top of the other address (preprinted by the sender). Accordingly, the present invention discloses generating an indicium from a unique registration ID number to satisfy the IBI requirements.

Additional features of the invention are discussed below in the Argument section of this Brief. This summary is not intended to supplant the description of the claimed subject matter as provided in the claims as recited in Appendix A, as

understood in light of the entire specification. Further, any references to the specification or structure in the specification incorporated in the above descriptions of the claims are exemplary and should not be considered limiting in nature.

VI. ISSUES.

The Rejections

1. Claims 1-6, 9-12, 15-16, 22, 25, 28, 31, 34, 36, 39 and 42 stand rejected under 35 USC §103(a) as being rendered obvious by U. S. Patent No. 6,055,520 to Heiden et al. ("Heiden '520") in view of U.S. Patent Application No. 2003/0192944 to Sansone et al. ("Sansone '944").
2. Claims 7-8, 13-14, 17-18, 21, 23-24, 26, 32-33, 35, 37-38, 40-41 and 43-44 stand rejected under 35 USC §103(a) as being rendered obvious by Heiden '520 and Sansone '944, further in view of U. S. Patent No. 6,121,565 to Allott, III ("Allott '565").

IV. GROUND OF REJECTION TO BE REVIEWED ON APPEAL

1. Do the asserted references satisfy the rule that each of the claimed elements be disclosed or suggested in the asserted reference in order to satisfy obviousness under 35 USC §103? In particular, do the asserted references describe or support the steps and elements relating to using a postage metering system with business reply mail pieces that complies with the United States Postal Service's IBIP standard.
2. Do the asserted references satisfy the rule that a motivation to combine the elements in the claimed manner must be identified? Has hindsight been improperly used by the Examiner in lieu of identifying a motivation to combine in the asserted prior art in the manner claimed?

VIII. ARGUMENT

As Appellant discusses in detail below, the final rejection of Claims 1-18, 21-26 and 28-44 is devoid of any factual or legal premise that supports the

position of unpatentability. It is respectfully submitted that the rejection does not even meet the threshold burden of presenting a *prima facie* case of unpatentability. For this reason alone, Appellant is entitled to the grant of a patent. *In re Oetiker*, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir.1992).

- A. The subject matter defined by Claims 1-6, 9-12, 15-16, 22, 25, 28, 31, 34, 36, 39, and 42 are not rendered obvious by Heiden '510 in view of Sansone '944.

To establish a proper case of obviousness under §103(a), the Examiner must make a *prima facie* showing that the prior art contains some teaching or suggestion of, or motivation for, all the elements of the claimed invention. Thus, it is well settled that the Examiner “bears the initial burden...of presenting a *prima facie* case of unpatentability.” *In re Piasecki*, 223 USPQ 785, 788 (Fed. Cir. 1984); *In re Oetiker*, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992); *In re Rijckaert*, 28 USPQ2d 1955, 1956 (Fed. Cir. 1993).

In rejecting a claim under 35 USC §103, the Examiner is charged with the initial burden for providing a factual basis to support the obviousness conclusion. *In re Warner*, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967); *In re Lunsford*, 375 F.2d 385, 148 USPQ 721 (CCPA 1966); *In re Freed*, 425 F.2d 785, 165 USPQ 570 (CCPA 1970). The Examiner is also required to explain how and why one having ordinary skill in the art would have been led to modify an applied reference and/or combine applied references to arrive at the claimed invention. *In re Ochiai*, 37 USPQ2d 1127 (Fed. Cir. 1995); *In re Deuel*, 51 F.3d 1552, 34 USPQ 1210 (Fed. Cir. 1995); *In re Fritch*, 972 F.2d 1260; 23 USPQ 1780 (Fed. Cir. 1992); *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). In establishing the requisite motivation, it has been consistently held that both the suggestion and reasonable expectation of success must stem from the prior art itself, as a whole. *In re Ochiai*, supra; *In re Vaeck*, 947 F.2d 4800, 20 USPQ2d 1438 (Fed. Cir. 1991); *In re Fine*, 837 F.2d 1071, 5 USPQ2d

1596 (Fed. Cir. 1988); *In re Dow Chemical Co.*, 837 F.2d 469, 5 USPQ2d 1529 (Fed. Cir. 1988).

It is respectfully submitted that the rejection of these claims should be withdrawn, because the cited references fail to describe or suggest the various elements of the claimed invention. Further, Appellant respectfully submits that the Examiner has misconstrued the teachings of the asserted references as applied to the present invention, and the rejection does not even meet the threshold burden of presenting a *prima facie* case of unpatentability. For these reasons, Appellant is entitled to a grant of a patent.

As discussed above, the present invention is directed to a method of operating a postage metering system for printing postage indicia information on a business reply mail piece in a manner that complies with United States Postal IBIP Regulations requiring that a delivery address and corresponding postage indicium be printed at the same time when printing postage indicium from a computer-based postage metering system. This is difficult to achieve with business reply mail when the delivery address is pre-printed on the envelope. According to one aspect of the present invention, the disadvantage in the prior art is overcome with a postage metering system that includes the steps of having a mail campaign sender transmit a registration ID number to a data center; the registration ID number being associated with a particular delivery address; generating and receiving postage indicium information from the data center where the postage indicium information has been generated using the registration ID number containing data relating to the delivery address; disclosing the delivery address in human readable form to a user of the postage meter system; and printing the postage indicium on an associated business reply mail piece for delivery to its intended designation.

There is absolutely no teaching or suggestion in Heiden '520 of a business reply mail piece where the postage indicium appearing on the mail piece is generated using a registration ID number containing data relating to the delivery address, where a postage meter user obtains the registration ID number from a mail campaign sender, the user then transmits the registration ID number to the data center, the postal indicium is created from this registration ID number, the user prints the postal indicium on the business reply mail piece in accordance with the IBI requirements, and where the delivery address is disclosed in human readable form to the user of the postage meter system.

To the contrary, Heiden '520 is directed to a system for the production of mail pieces where the delivery address is not imprinted on the mail piece, nor is it disclosed in human readable form to the party producing the mail piece. This is done to preserve the confidential nature of mailing lists in Heiden '520. And, more importantly, Heiden '520 does not teach or disclose the generation and use of a registration ID number as disclosed in the present invention for the creation of a postal indicia.

Applicant submits that the Examiner has misconstrued the teachings of Heiden '520 by relying on the service provider ID (see Heiden '520, Column 5, lines 26-27) as the registration ID number of the present invention. The service provider ID of Heiden '520 is merely an identifier of the party who has provided the address and is used by the Postal Service to forward surcharges to the service provider who charges for mailing lists on a per use/per address basis (see Heiden '520, Col. 6, lines 29-34). This service provider ID is separate and distinct from delivery address information. And, most importantly, there is no disclosure or suggestion in Heiden '520 that this service provider ID corresponds to a delivery address that is used to generate indicia. In fact, the service provider ID should remain the same for that service provider, whereas the registration ID number of the present invention is a unique number that changes with each delivery address. There is no disclosure in Heiden '520 that its service provider ID is created by a data center or center and transmitted to a user for the purpose of generating indicia. The service provider ID of Heiden '520 and the registration ID number of the present invention are two different identifiers that serve very different purposes.

Instead of generating a registration ID number to be used to generate postage indicia as presently claimed, Heiden '520, in another embodiment relied upon by the Examiner at col. 8, lines 24-47, uploads a mailing list to a local PSD. The postal indicia are generated directly from the mailing list, and at the same time the system generates security information to be used to validate the indicia. There is no disclosure of generating a registration ID number in a first step and then using that registration ID number to generate the postal indicia, and the disclosure of Heiden '520 would not provide a solution to the problem being solved by the present invention.

Also, Heiden '520 does not disclose the delivery address in human readable form to the party producing the mail piece. Heiden '520 discloses the following in col. 1, lines 44-48: "Thus it is an object of the subject invention to provide a mailpiece which is not imprinted with a delivery address in human readable form and methods and systems for

producing such a mailpiece without disclosing the delivery address to the party producing the mailpiece.”

In addition, Heiden ‘520 disclosed the following in col. 1, lines 62-64: “A postal service can scan the barcoded information to recover the delivery information and determine the delivery address, and the mailpiece can be produced and delivered to the postal service by a party who does not have knowledge of the delivery address.”

The Examiner recognized on pages 9, 11, 13 and 16 of the Final Office Action that “Heiden doesn’t explicitly disclose in human readable form to the user of the postage metering system,” so the Examiner relied on Sansone ‘944 to cure that deficiency. Applicant submits that Sansone ‘944 does not cure this deficiency of Heiden ‘520, nor does it cure the other deficiencies discussed above, for at least the reasons stated below.

Sansone ‘944 is directed to solving another disadvantage of the prior art when complying with the United States Postal Service’s IBIP requirements. That disadvantage occurs when using a personal computer printer to print a Facing Identification Mark (FIM) with an IBI indicium along the top of an envelope. The FIM is a pattern of vertical bars printed in the upper right portion of the mail piece to the left of the indicia. Printing this FIM causes problems with personal computer printers because it is difficult for personal computer printers to print near the top of paper or envelopes. This difficulty may result in an unreadable IBI indicium and the possible loss of the customer’s postage. Another difficulty is for personal computer printers to print an IBI indicia in proper registration to a preprinted FIM.

Accordingly, Sansone ‘944 provides a novel envelope that personal computer printers will be able to print FIM and IBI indicia in an acceptable manner. There is no teaching or suggestion in Sansone ‘944 of having a mail campaign sender transmitting delivery address information to a data center, generating a registration ID number where the registration ID number contains data relating to the delivery address, generating postage indicium using the registration ID number, and where the postal indicium is printed on a business reply mail piece in compliance with the IBI regulations.

In addition to not disclosing critical elements of the present invention, Sansone ‘944 is not properly combined with Heiden ‘520 because Heiden ‘520 specifically teaches printing a delivery address that is not human readable (this is to preserve the confidentiality of mailing lists), so applicant submits that it is not proper to combine any reference (including Sansone ‘944) with Heiden ‘520 to show that it is obvious to include

a human readable representation of data when Heiden '520 specifically teaches against such a human readable component. Applicant submits that the combination of these references is improper.

In addition to being allowable for the reasons provided above, Applicant also respectfully submits that dependent claim 2 is allowable because the Examiner has misinterpreted the teachings of Heiden '520 with respect to this claim. Heiden '520 teaches that the delivery address is only printed by the postal service once the delivery address is scanned and received at the postal service. The user at the postage metering system producing the mail piece does not print the delivery address. In fact, as disclosed above, in Heiden '520 the delivery address is never disclosed in human readable form to the user producing the mailpiece, so it can never be printed in human readable form by that user. It is only disclosed to the postal service processing the mail piece. This process is described in Heiden '520 in col. 6, lines 35-67:

Fig. 2 shows a scanning system for use by a postal service to scan an indicia such as are shown in FIG.1. Mailpieces MP are imprinted with indicia 10 and are not otherwise imprinted with a delivery address in human readable form. As mailpieces MP move in the direction of arrow 32, field 30 is scanned by barcode scanner 34 which is controlled by IBIP controller 36. . . . Once the delivery address is recovered controller 36 will control printer 38 to print delivery address DA onto mail-piece MP in a conventional manner. In other embodiments of the subject invention a conventional, a one dimensional postal barcode PBC, such as the well known "Postnet" barcode, can be printed onto mailpieces MP to facilitate further sortation of mailpieces MP. Once mailpieces MP are printed with delivery address DA they can thereafter be handled and delivered in a conventional manner. (Emphasis supplied).

To the contrary, dependent Claim 2 requires "printing the delivery address on the business reply mail piece at the postage metering system . . . " Accordingly, for all of the reasons identified above, Applicant submits that dependent Claim 2 and all pending claims are not rendered obvious by Heiden '520 in combination with Sansone '944.

Appellant submits that the Examiner has improperly combined two references with teachings that are in sharp contrast to the present invention; and, although various features are described in the separate references, there is no suggestion to combine the references in the manner recited. In particular, there is no suggestion to combine the references such that the postage indicium appearing on the business reply mail piece of the present invention is generated using a registration ID number and data relating to the delivery address. This

claimed feature of the claimed invention solves a problem that is not addressed in any of the asserted references. That problem is operating a postage meter for printing postage indicium information on a business reply mail piece in compliance with the USPS IBIP regulations.

- B. The subject matter defined by claims 7-8, 13-14, 17-18, 21, 23-24, 26, 32-33, 35, 37-38, 41 and 43-44 are not rendered obvious by Heiden '520, Sansone '944, in further view of Allott '565.

The Examiner relies on Allott '565 for teaching a method of delivering a business reply mail piece using expiring indicia. However, there is absolutely no suggestion in Allott '565 for a customer to contact a data center to obtain postal indicia information. The postal indicia in Allott '565 is already pre-printed on the envelope, the customer does not contact a data center to obtain postage indicium information. Further, there is absolutely no teaching or suggestion in Allott '565 of at least associating a registration ID number with a previously defined delivery address; transmitting the registration ID number to a data center; generating the postal indicia information using the registration ID number; transmitting the postage indicium information to a postage metering system; and the printing the postage indicium information on an associated business reply mail piece. Thus, Appellant submits that these references are not properly combined to render the present invention obvious. Appellant respectfully submits that the Examiner may have used hindsight to solve the problem addressed by the present invention.

Accordingly, Applicant submits that for at least the reasons states above, the cited references do not alone or in proper combination render obvious the invention as presently claimed in claims 7-8, 13-14, 17-18, 21, 23-24, 26, 32-33, 35, 37-38, 41 and 43-44. Accordingly, Applicant respectfully requests that the withdrawal of the rejection.

Hindsight reasoning is improper to fill in the gaps in the prior art. "It is improper, in determining whether a person of ordinary skill would have been led

to this combination of references, simply to “[use] that which the inventor taught against its teacher.” *In re Lee*, 277 F.3d at 1344 (citing *W. L. Gore v. Garlock, Inc.*, 721 F.2d 1540, 1553, 220 USPQ 303, 312-13 (Fed. Cir. 1983). See also *In re Dembiczak*, 175 F.3d 994, 999-1000, 50 USPQ2d 1614 (Fed. Cir. 1999) (cautioning that “the very ease with which the invention can be understood may prompt one to ‘fall victim to the insidious effect of a hindsight syndrome.’”) (citing *W. L. Gore*, 721 F.2d 1540).

Without using the present claims as a road map, it would not have been obvious to make the multiple, selective modifications needed to arrive at the claimed invention from these references. The rejection uses impermissible hindsight to reconstruct the present invention from these references. See *Ex parte Clapp*, 227 USPQ972, 973 (Bd. App. 1985) (requiring “convincing line of reasoning” to support obviousness determination). The fact that the present invention was made by the Applicant does not make the present invention obvious, that suggestion or teaching must come from the prior art. See *C. R. Bard, Inc. v. M3 Systems, Inc.*, 157 F.3d 1340, 1352 (Fed. Cir. 1998). See, e.g., *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 1051 (Fed. Cir. 1988) (it is impermissible to reconstruct the claimed invention from selected pieces of prior art absent some suggestion, teaching or motivation in the prior art to do so). No such suggestion, teaching or motivation has been provided by the Examiner.

IX. CONCLUSION

For the reasons advanced above, Appellant respectfully submits that claims 1-18, 21-26 and 28-44 are patentable. Reversals of the rejections by the Examiner are respectfully solicited.

Respectfully submitted,



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APPENDIX A TO APPELLANT'S APPEAL BRIEF
CURRENT COPY OF THE CLAIMS ON APPEAL

1. A method of operating a postage metering system for printing a postage indicium subsidized by a mail campaign sender for use with a business reply mail piece, the method comprising the step(s) of:

transmitting a registration ID number, provided by the mail campaign sender to a user, from the postage metering system to a data center, the registration ID number being associated with a delivery address previously defined by the mail campaign sender and disclosed in human readable form to the user of the postage metering system; receiving postage indicium information at the postage metering system from the data center, the postage indicium information generated using the registration ID number and including data relating to the delivery address; and printing the postage indicium on the business reply mail piece at the postage metering system using the postage indicium information.

2. The method of claim 1, further comprising the step(s) of:

printing the delivery address on the business reply mail piece at the postage metering system, where the delivery address has been selected, by the data center from a plurality of delivery addresses previously defined by the mail campaign sender, according to parameters associated with the user of the postage metering system that were previously established by the mail campaign sender.

3. The method of claim 2, further comprising the step(s) of:

receiving a subsidy provided by the data center to the user of the postage metering system for mailing the business reply mail piece.

4 A method of operating a data center for generating postage indicium information for use with printing a postage indicium on a business reply mail piece, the method comprising the step(s) of:

receiving a delivery address from a mail campaign sender corresponding to a mail campaign of which the business reply mail piece is a part;
generating a registration ID number corresponding to the delivery address;
providing the registration ID number to the mail campaign sender;

establishing a transaction session with a postage metering system;
receiving the registration ID number from the postage metering system, where the registration ID number and delivery address in human readable form were previously provided by the mail campaign sender to a user of the postage metering system;
generating the postage indicium information using the registration ID number and data relating to the delivery address; and
transmitting the postage indicium information to the postage metering system for use in printing the postage indicium on the business reply mail piece.

5. The method of claim 4, further comprising the step(s) of:
performing address hygiene on the delivery address; and
transmitting a hygiened addressed to the sender.
6. The method of claim 5, further comprising the step(s) of:
providing a subsidy to the user for mailing the business reply mail piece; and
charging the subsidy to the mail campaign sender.
7. The method of claim 6, further comprising the step(s) of:
receiving an expiration date from the mail campaign sender beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and
providing a warning to the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.
8. The method of claim 4, further comprising the step(s) of:
receiving an expiration date from the mail campaign sender beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and
providing a warning to the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.
9. A method of operating a business reply mail processing system by a mail campaign sender, the method comprising the step(s) of:

providing a delivery address, associated with a particular mail campaign which includes a business reply mail piece, to a data center;
receiving from the data center a registration ID number associated with the delivery address; and
supplying the registration ID number, the business reply mail piece and delivery address in human readable form to a user of a postage metering system, where the registration ID number is used by the user to print a postal indicium on the business reply mail piece including data relating to the delivery address.

10. The method of claim 9, further comprising the step(s) of:

receiving from the data center a new hygiened address representing a version of the delivery address prior to supplying the registration ID number and the business reply mail piece to the user, where the new hygiened address is to be used as the delivery address.

11. The method of claim 10, further comprising the step(s) of:

printing the registration ID number on the business reply mail piece.

12. The method of claim 11, further comprising the step(s) of:

authorizing the data center to provide a subsidy to the user for mailing the business reply mail piece; and
authorizing the data center to charge the subsidy to the mail campaign sender.

13. The method of claim 12, further comprising the step(s) of:

providing the data center with an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and
authorizing the data center to warn the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.

14. The method of claim 9, further comprising the step(s) of:

providing the data center with an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and

authorizing the data center to warn the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.

15. A memory device in operative communication with a computing system, the memory device comprising:

a plurality of mail campaign sender accounts associated with respective mail campaign senders, where each of the plurality of mail campaign sender accounts includes a registration ID number associated with a delivery address and a particular mail campaign of which a business reply mail piece is a part, respectively, where said registration ID number is used to generate a postage indicium, and where said postage indicium and delivery address in human readable form are provided to a user of a postage metering system.

16. The memory device of claim 15, wherein:

at least one of the plurality of mail campaign sender accounts further includes an indication associated with the registration ID number to determine whether or not the respective mail campaign sender authorizes a subsidy to a user for mailing the business reply mail piece.

17. The memory device of claim 16, wherein:

at least one of the plurality of mail campaign sender accounts further includes an expiration date, beyond which the business reply mail piece is no longer wanted by the mail campaign sender, associated with the registration ID number to determine whether or not to provide a warning to the user.

18. The memory device of claim 15, wherein:

at least one of the plurality of mail campaign sender accounts further includes an expiration date, beyond which the business reply mail piece is no longer wanted by the mail campaign sender, associated with the registration ID number to determine whether or not to provide a warning to the user.

19. (Cancelled)

20. (Cancelled)

21. The method of claim 3, further comprising the step(s) of:
receiving the subsidy only if the business reply mail piece is posted within a specified time period defined by the mail campaign sender.
22. The method of claim 1, further comprising the step(s) of:
receiving a subsidy provided by the data center to the user of the postage metering system for mailing the business reply mail piece.
23. The method of claim 22, further comprising the step(s) of:
receiving the subsidy only if the business reply mail piece is posted within a specified time period defined by the mail campaign sender.
24. (Previously Presented) The method of claim 1, further comprising the step(s) of:
displaying a warning to the user if the user contacts the data center after an expiration date, defined by the mail campaign sender and beyond which the business reply mail piece is no longer wanted by the mail campaign sender, attempting to obtain postage for the business reply mail piece, where the expiration date is associated with the registration ID number.
25. The method of claim 4, further comprising the step(s) of:
providing a subsidy to the user for mailing the business reply mail piece; and
charging the subsidy to the mail campaign sender.
26. The method of claim 25, further comprising the step(s) of:
providing the subsidy only if the business reply mail piece is posted within a specified time period defined by the mail campaign sender.
27. (Cancelled)
28. The method of claim 4, further comprising the step(s) of:
storing a plurality of delivery addresses previously defined by the mail campaign sender;
and
selecting the delivery address for the business reply mail piece from the plurality of

delivery addresses according to parameters, previously established by the mail campaign sender, associated with the user of the postage metering system.

29. The method of claim 6, further comprising the step(s) of:

storing a plurality of delivery addresses previously defined by the mail campaign sender;
and

selecting the delivery address for the business reply mail piece from the plurality of delivery addresses according to parameters, previously established by the mail campaign sender, associated with the user of the postage metering system.

30. The method of claim 4, further comprising the step(s) of:

providing a notification to the mail campaign sender when business reply mail piece is posted by the user.

31. The method of claim 6, further comprising the step(s) of:

providing a notification to the mail campaign sender when the business reply mail piece is posted by the user.

32. The method of claim 12, further comprising the step(s) of:

specifying a time period in which the business reply mail piece must be posted to receive the subsidy; and

authorizing the data center to charge the subsidy to the mail campaign sender only if the business reply mail piece is posted within the specified time period.

33. The method of claim 9, further comprising the step(s) of:

specifying an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender; and

authorizing the data center to provide a warning to the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.

34. The method of claim 9, further comprising the step(s) of:

defining a plurality of delivery addresses; and

establishing parameters for use in determining a selected one of the plurality of delivery

address to use as the delivery address on the business reply mail piece, where the parameters are associated with the user of the postage metering system.

35. The memory device of claim 15, wherein:

some of the plurality of mail campaign sender accounts further include an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender.

36. The memory device of claim 15, wherein:

some of the plurality of mail campaign sender accounts further include: (i) a plurality of delivery addresses; and (ii) parameters for use in determining a selected one of the plurality of delivery address to use as the delivery address on the business reply mail piece, where the parameters are associated with the user of the postage metering system.

37. The memory device of claim 17, wherein:

some of the plurality of mail campaign sender accounts further include an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender.

38. The memory device of claim 17, wherein:

some of the plurality of mail campaign sender accounts further include: (i) a plurality of delivery addresses; and (ii) parameters for use in determining a selected one of the plurality of delivery address to use as the delivery address on the business reply mail piece, where the parameters are associated with the user of the postage metering system.

39. The method of claim 4, further comprising the step(s) of:

sending a message to the mail campaign sender indicating that the user has dispatched the business reply mail piece.

40. The method of claim 7, further comprising the step(s) of:

sending a message to the mail campaign sender indicating that the user has dispatched the business reply mail piece.

41. The method of claim 26, further comprising the step(s) of:
 sending a message to the mail campaign sender indicating that the user has dispatched
 the business reply mail piece.
42. The method of claim 9, further comprising the step(s) of:
 receiving a message from the data center indicating that the user has dispatched the
 business reply mail piece.
43. The method of claim 14, further comprising the step(s) of:
 receiving a message from the data center indicating that the user has dispatched the
 business reply mail piece.
44. The method of claim 33, further comprising the step(s) of:
 receiving a message from the data center indicating that the user has dispatched the
 business reply mail piece.

APPENDIX B TO APPELLANT'S APPEAL BRIEF

Evidence Appendix

None

APPENDIX C TO APPELLANT'S APPEAL BRIEF

Relates Proceeding Appendix

None